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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

This Document Relates to:

ALL INDIRECT-PURCHASER ACTIONS

*Electrograph Sys., Inc., et al. v. Hitachi, Ltd., et al.*, No. 11-cv-01656;

*Electrograph Sys., Inc., et al. v. Technicolor SA, et al.*, No. 13-cv-05724;

*Siegel v. Hitachi, Ltd., et al.*, No. 11-cv-05502;

*Siegel v. Technicolor SA, et al.*, No. 13-cv-05261;

*Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.*, No. 11-cv-05513;

*Best Buy Co., Inc., et al. v. Technicolor SA, et al.*, No. 13-cv-05264;

Master No.: 3:07-cv-05944 SC  
MDL No. 1917

**[PROPOSED] ORDER GRANTING  
ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL INDIRECT  
PURCHASER AND CERTAIN  
DIRECT ACTION PLAINTIFFS'  
OPPOSITION TO DEFENDANTS'  
JOINT MOTION FOR PARTIAL  
SUMMARY JUDGMENT AGAINST  
INDIRECT PURCHASER AND  
CERTAIN DIRECT ACTION  
PLAINTIFFS FOR LACK OF  
ANTITRUST INJURY AND  
ANTITRUST STANDING UNDER  
FEDERAL AND CERTAIN STATE  
LAWS**

1       *Target Corp. v. Chunghwa Picture Tubes, Ltd.,*  
2       *et al.*, No. 11-cv-05514;

3       *Target Corp. v. Technicolor SA, et al.*, No. 13-  
4       cv-05686;

5       *Sears, Roebuck & Co., et al. v. Chunghwa*  
6       *Picture Tubes, Ltd., et al.*, No. 11-cv-05514;

7       *Sears, Roebuck & Co., et al. v. Technicolor SA,*  
8       *et al.*, No. 13-cv-05262;

9       *Interbond Corp. of Am. v. Hitachi, Ltd., et al.*,  
10      No. 11-cv-06275;

11      *Interbond Corp. of Am. v. Technicolor SA, et al.*,  
12      No. 13-cv-05727;

13      *Office Depot, Inc. v. Hitachi, Ltd., et al.*, No. 11-  
14      cv-06276;

15      *Office Depot, Inc. v. Technicolor SA, et al.*, No.  
16      13-cv-05726;

17      *CompuCom Systems, Inc. v. Hitachi, Ltd., et al.*,  
18      No. 11-cv-06396;

19      *Costco Wholesale Corp. v. Hitachi, Ltd., et al.*,  
20      No. 11-cv-06397;

21      *Costco Wholesale Corp. v. Technicolor SA, et*  
22      *al.*, No. 13-cv-05723;

23      *P.C. Richard & Son Long Island Corp., et al. v.*  
24      *Hitachi, Ltd., et al.*, No. 12-cv-02648;

25      *P.C. Richard & Son Long Island Corp., et al. v.*  
26      *Technicolor SA, et al.*, No. 13-cv-05725;

27      *Schultze Agency Servs., LLC v. Hitachi, Ltd., et*  
28      *al.*, No. 12-cv-02649;

29      *Schultze Agency Servs., LLC v. Technicolor SA,*  
30      *et al.*, No. 13-cv-05668;

31      *Tech Data Corp., et al. v. Hitachi, Ltd., et al.*,  
32      No. 13-cv-00157;

33      *Viewsonic Corp. v. Chunghwa Picture Tubes,*  
34      *Ltd., et al.*, No. 14-cv-02510

1                   Upon consideration of Indirect Purchaser and Certain Direct Action Plaintiffs'

2                   Administrative Motion to File Under Seal Pursuant to Civil Local Rules 79-5(d) and 7-11

3                   ("Administrative Motion to File Under Seal"), submitted in connection with Indirect Purchaser and

4                   Certain Direct Action Plaintiffs' Opposition to Defendants' Motion for Partial Summary Judgment

5                   Against Indirect Purchaser Plaintiffs and Certain Direct Action Plaintiffs for Lack of Antitrust

6                   Injury and Antitrust Standing Under Federal and Certain State Laws, it is hereby:

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8                   ORDERED that the Administrative Motion to File Under Seal is GRANTED; and it is

9                   further

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11                   ORDERED that the Clerk shall file and maintain under seal the following documents or

12                   excerpted portions of documents related to the Administrative Motion to File Under Seal:

| Document  | Sealed Portions   |
|---|---|
| Indirect Purchaser and Certain Direct Action Plaintiffs' Opposition to Defendants' Joint Motion for Partial Summary Judgment Against Indirect Purchaser Plaintiffs and Certain Direct Action Plaintiffs for Lack of Antitrust Injury and Antitrust Standing Under Federal and Certain State Laws  | 3: 26-28<br>4: 8-11, 15-21, 24-28<br>5: 8-28<br>6: 5-28<br>7: 11-19, 22-25<br>8: 17-23, 25-27 |
| Exhibit 1 of the Lauren C. Capurro Declaration in Support of Indirect Purchaser and Certain Direct Action Plaintiffs' Opposition to Defendants' Joint Motion for Partial Summary Judgment Against Indirect Purchaser Plaintiffs and Certain Direct Action Plaintiffs for Lack of Antitrust Injury and Antitrust Standing Under Federal and Certain State Laws (the "Capurro Declaration") (April 15, 2014 Expert Report of Janet S. Netz) | Entire document   |
| Exhibit 2 of the Capurro Declaration (April 15, 2014 Expert Report of Kenneth G. Elzinga)   | Entire document   |
| Exhibit 3 of the Capurro Declaration (April 15, 2014 Expert Report of James T. McClave)   | Entire document   |
| Exhibit 4 of the Capurro Declaration (Excerpts from the transcript of the July 18, 2012 deposition of Hirokazu Nishiyama, a Fed. R.   | Entire excerpted document   |

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|----|---|---------------------------|
| 1  | Civ. P. 30(b)(6) witness for Defendants MT<br>Picture Display Co., Ltd., Panasonic<br>Corporation and Panasonic Corporation of<br>North America (“Panasonic”))  |                           |
| 2  | Exhibit 5 of the Capurro Declaration (Excerpts<br>from the transcript of the February 19, 2013<br>deposition of Chih Chun Liu, a witness of<br>Defendant Chungwha Picture Tubes, Ltd.)  | Entire excerpted document |
| 3  | Exhibit 6 of the Capurro Declaration (Excerpts<br>from the transcript of the February 17, 2013<br>deposition of Jing Song Lu, a witness of<br>Defendant Chungwha Picture Tubes, Ltd.)   | Entire excerpted document |
| 4  | Exhibit 7 of the Capurro Declaration (April 15,<br>2014 Expert Report of Alan S. Frankel)   | Entire document           |
| 5  | Exhibit 8 of the Capurro Declaration (Excerpts<br>from the transcript of the July 3, 2012<br>deposition of Lloyd Thomas Heiser, a Fed. R.<br>Civ. P. 30(b)(6) witness for Defendant Hitachi<br>Electronic Devices (USA))  | Entire excerpted document |
| 6  | Exhibit 9 of the Capurro Declaration (Excerpts<br>from the transcript of the July 12, 2012<br>deposition of Yasu Hisa Takeda, a Fed. R. Civ.<br>P. 30(b)(6) witness for Defendant Hitachi,<br>Ltd.)   | Entire excerpted document |
| 7  | Exhibit 10 of the Capurro Declaration<br>(Excerpts from the transcript of the July 31,<br>2012 deposition of Roger de Moor, a Fed. R.<br>Civ. P. 30(b)(6) witness for Defendants Philips<br>Electronics North America Corporation, Inc.<br>and Koninklijke Philips Electronics<br>N.V. Philips (“Philips”))   | Entire excerpted document |
| 8  | Exhibit 11 of the Capurro Declaration<br>(Excerpts from the transcript of the June 7,<br>2012 deposition of Jae In Lee, a Fed. R. Civ. P.<br>30(b)(6) witness for Defendants Samsung SDI<br>Co., Ltd., Samsung SDI America, Inc.,<br>Samsung SDI Mexico, S.A. de C.V., Samsung<br>SDI Brazil Ltda., Shenzhen Samsung SDI Co.,<br>Ltd., Tianjin Samsung SDI Co., Ltd. and<br>Samsung SDI Malaysia (“Samsung SDI”)) | Entire excerpted document |
| 9  | Exhibit 12 of the Capurro Declaration<br>(Excerpts from the transcript of the July 9,<br>2012 deposition of Choong Ryul Park, a Fed.<br>R. Civ. P. 30(b)(6) witness for Defendants LG<br>Electronics, Inc. and LG Electronics USA, Inc.<br>(“LG Electronics”))  | Entire excerpted document |
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| 1  | Exhibit 13 of the Capurro Declaration (October 1, 2012 Declaration of Janet S. Netz in Support of Motion of Indirect Purchaser Plaintiffs for Class Certification)  | Entire document           |
| 2  | Exhibit 14 of the Capurro Declaration (September 26, 2014 Rebuttal Expert Report of Janet S. Netz)  | Entire document           |
| 3  | Exhibit 15 of the Capurro Declaration (Excerpts from the transcript of the July 16, 2012 deposition of Tatsuo Tobinaga, a Fed. R. Civ. P. 30(b)(6) witness for Defendant Panasonic)   | Entire excerpted document |
| 4  | Exhibit 16 of the Capurro Declaration (Excerpts from the transcript of the July 19, 2012 deposition of Masahiro Kimura, a Fed. R. Civ. P. 30(b)(6) witness for Defendant Panasonic)   | Entire excerpted document |
| 5  | Exhibit 17 of the Capurro Declaration (Excerpts from the transcript of the July 31, 2012 deposition of Jay Alan Heinecke, a Fed. R. Civ. P. 30(b)(6) witness for Defendant Toshiba America Electronics Corp.)                             | Entire excerpted document |
| 6  | Exhibit 18 of the Capurro Declaration (Excerpts from the transcript of the July 17, 2012 deposition of Nobuhiko Kobayashi, a Fed. R. Civ. P. 30(b)(6) witness for Defendant Hitachi Displays, Ltd.)                                       | Entire excerpted document |
| 7  | Exhibit 19 of the Capurro Declaration (CHU00031240-247 produced in this litigation by Defendant Chunghwa Picture Tubes, Ltd.)   | Entire document           |
| 8  | Exhibit 20 of the Capurro Declaration (CHU00030787-794 produced in this litigation by Defendant Chunghwa Picture Tubes, Ltd.)   | Entire document           |
| 9  | Exhibit 21 of the Capurro Declaration (CHU00030731-733 produced in this litigation by Defendant Chunghwa Picture Tubes, Ltd.)   | Entire document           |
| 10 | Exhibit 22 of the Capurro Declaration (Excerpts from the transcript of the July 9, 2012 deposition of Mok Hyeon Seong, a Fed. R. Civ. P. 30(b)(6) witness for Defendant LG Electronics)   | Entire excerpted document |
| 11 | Exhibit 23 of the Capurro Declaration (Excerpts from the transcript of the July 16, 2012 deposition of Kim London, a Fed. R. Civ. P. 30(b)(6) witness for Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.) | Entire excerpted document |
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| 1  | Exhibit 24 of the Capurro Declaration<br>(Excerpts from the transcript of the September<br>5, 2014 deposition of Jack Brunk, a witness of<br>Defendant Thomson Consumer Electronics,<br>Inc. ("Thomson"))  | Entire excerpted document |
| 2  | Exhibit 25 of the Capurro Declaration<br>(Excerpts from the transcript of the August 27,<br>2014 deposition of James Hanrahan, a witness<br>of Defendant Thomson)  | Entire excerpted document |
| 3  | Exhibit 26 of the Capurro Declaration<br>(Excerpts from the transcript of the October<br>27, 2014 deposition of Tomoyuki Kawano, a<br>witness of Defendant Toshiba, Corp.)   | Entire excerpted document |
| 4  | Exhibit 27 of the Capurro Declaration<br>(Excerpts from the transcript of the June 26,<br>2014 deposition of John La Regina, a witness<br>of DAP Plaintiff P.C. Richard & Son Long<br>Island Corp.)  | Entire excerpted document |
| 5  | Exhibit 28 of the Capurro Declaration<br>(Excerpts from the transcript of the June 19,<br>2014 deposition of Wendy Linksi, a witness of<br>DAP Plaintiffs Tech Data Corp. and Tech Data<br>Product Management, Inc.)   | Entire excerpted document |
| 6  | Exhibit 29 of the Capurro Declaration<br>(Excerpts from the transcript of the June 20,<br>2014 deposition of Christopher Groves, a<br>witness of DAP Plaintiffs Best Buy Co., Inc,<br>Best Buy Enterprise Services, Inc., Best Buy<br>Purchasing LLC, Best Buy Stores, L.P. and<br>Best Buy.com LLC) | Entire excerpted document |
| 7  | Exhibit 30 of the Capurro Declaration<br>(Excerpts from the transcript of the February<br>26, 2013 deposition of Sheng-Jen Yang, a<br>witness of Defendant Chungwha Picture<br>Tubes)  | Entire excerpted document |
| 8  | Exhibit 31 of the Capurro Declaration (July 3,<br>2014 Errata to the Expert Report of Janet S.<br>Netz)  | Entire document           |
| 9  | Exhibit 32 of the Capurro Declaration<br>(Excerpts from the transcript of the June 27,<br>2014 deposition of Janet S. Netz)  | Entire excerpted document |
| 10 | Exhibit 33 of the Capurro Declaration<br>(September 25, 2014 Second Supplemental<br>Expert Report of Alan S. Frankel)  | Entire document           |
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1 IT IS SO ORDERED  
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3 Dated: \_\_\_\_\_

4 Hon. Samuel Conti  
5 United States District Judge  
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